

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA)

Cr. No. 05-189 (JDB)

v.)

MICHAEL JACKSON)

**MOTION TO CONTINUE SENTENCING CURRENTLY SCHEDULED FOR
DECEMBER 16, 2005 AT 2:00 P.M.**

Defendant, Michael Jackson, through undersigned counsel, respectfully moves this Honorable Court to continue the sentencing currently scheduled for December 16, 2005 at 2:00 p.m. In support of this motion, Mr. Jackson states as follows:

Counsel begins a recently-rescheduled trial before the Honorable Henry H. Kennedy on Tuesday, December 13, 2005. Counsel anticipates that the trial, including jury selection, will last approximately four days. Counsel has spent the last several days preparing for the upcoming trial and intends to focus on trial preparation for the remainder of the week.

In addition, counsel has additional preparation to complete in order to effectively represent Mr. Jackson at sentencing. In particular, counsel has requested documents pertaining to her client's medical background and is awaiting the results of a mental health evaluation. Counsel anticipates that she will need an additional four-six weeks to obtain the necessary documents and information.

Mr. Jackson agrees with this motion and seeks no change in his bond condition. Counsel telephoned Wanda Dixon, Esq., counsel for the government in this matter, but was unable to reach her to ascertain her position as to the instant motion.

For the reasons set forth above, counsel asks the Court to continue the sentencing currently scheduled for December 16, 2005 for a period of approximately six weeks.

Respectfully submitted,

A.J. KRAMER
FEDERAL PUBLIC DEFENDER

/s/_____
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